

EXHIBIT A

FILED
2023 DEC 13 11:48 AM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE # 23-2-24660-8 KNT

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

RACHEL WASHINGTON, Executor of the
Estate of ISAIAH WASHINGTON, deceased,

NO. KNT
COMPLAINT FOR DAMAGES AND JURY DEMAND

Plaintiff,

v

THE BOEING COMPANY,

Defendant.

II. PARTIES

1.1 Rachel Washington is the Executor and Personal Representative for the Estate of Isiah Washington (“Mr. Washington”), who was a resident of King County. Mr. Washington was an employee of Defendant Boeing Company and is now deceased.

1.2 Defendant Boeing Company ("Boeing") is a for profit corporation which conducts business, including operating an assembly plant, in Renton, King County, Washington.

COMPLAINT FOR DAMAGES AND JURY DEMAND - 1

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
(206) 628-6600

II. JURISDICTION AND VENUE

2.1 This Court, under RCW 2.08.010, has jurisdiction over the claims asserted in this case.

2.2 Venue is proper under RCW 4.92.010 because the acts giving rise to this lawsuit occurred in King County, Washington.

III. FACTS

3.1 Mr. Washington was an employee of Defendant Boeing, working on the assembly line at the Boeing Renton assembly plant.

3.2 Mr. Washington was a Black man.

3.3 Ralph O'Connor ("O'Connor") was Mr. Washington's co-worker. Mr. Washington worked with O'Connor on the assembly line. Upon information and belief, O'Connor was at the same level as Mr. Washington. .

3.4 Rachel Pettit ("Pettit") also worked at Boeing Renton assembly plant. Upon information and belief, Pettit was a "lead" on Mr. Washington's assembly. This position made Pettit superior to Mr. Washington and O'Connor, where she had certain supervisory responsibilities over both men.

3.5 As of November 21, 2022, Pettit was in a romantic sexual relationship with O'Connor. The romantic sexual relationship had been occurring for four years prior. O'Connor was married during the entire time of the romantic sexual relationship with Pettit.

3.6 As of November 21, 2022, Pettit was also in a sexual relationship with Mr. Washington. They had been this relationship a few months prior.

1 3.7 O'Connor found out about Pettit's and Mr. Washington's sexual relationship in
2 early September 2021. O'Connor discovered Mr. Washington's car at Pettit's home and
3 became angry, banging on the door and causing a scene.

4 3.8 O'Connor was very possessive of Pettit.

5 3.9 O'Connor had a history of anger and threats to other employees while he
6 worked with Defendant Boeing.

7 3.10 O'Connor had previously been suspended, or otherwise put on suspended leave,
8 by Defendant Boeing for threatening behavior towards another employee.

9 3.11 The week prior to November 21, 2022, several people from work , including
10 Boeing managers and supervisors, told Pettit that O'Connor was texting things that were
11 concerning. These co-workers knew that O'Connor was upset about Pettit and Mr. Washington
12 being in a sexual relationship. O'Connor texted these co-workers that he wanted to die and
13 "pull the trigger."

14 3.12 O'Connor's comments concerned the co-workers, including Boeing supervisors
15 and managers, enough that they were afraid for Pettit's safety. They told Pettit that she should
16 change work shifts so that she was not around O'Connor.

17 3.13 Brandon Mitchell ("Mitchell"), a Boeing manager, was aware of the safety
18 issues between O'Connor, Pettit, and Mr. Washington.

19 3.14 Boeing, through its manager Mitchell, confirmed that he was aware that Mr.
20 Washington was having issues with O'Connor because of Pettit.

21 3.15 Boeing, through its manager Mitchell, also confirmed O'Connor did not go to
22 work on November 21, 2022, and he had not called out for the day.

1 3.16 O'Connor had been trying to get help for mental health issues from Boeing, but
2 Boeing did not do anything.

3 3.17 According to O'Connor's wife, Boeing was aware that there was a dispute
4 between O'Connor and Mr. Washington "for a while," and Boeing did not do anything about it.

5 3.18 On November 21, 2022, O'Connor stalked Mr. Washington as he was going to
6 work at Boeing. O'Connor knew the time Mr. Washington would arrive for his shift because it
7 was the same shift that Mr. Washington had been assigned to the entire time. O'Connor waited
8 for Mr. Washington to park his car and walk through the Renton Landing to the Boeing plant.
9 O'Connor shot and killed Mr. Washington on the street, and then killed himself.

10 3.19 Prior to November 21, 2022, Boeing did not instruct Mr. Washington to change
11 his shift schedule or assign him to a different shift.

12 3.20 Prior to November 21, 2022, Boeing did not instruct Pettit to change her shift
13 schedule or assign her to a different shift.

14 3.21 Prior to November 21, 2022, Boeing did not terminate O'Connor, suspend
15 O'Connor, or otherwise take any action against O'Connor, despite his threats to Pettit and Mr.
16 Washington that were known to Boeing employees, including supervisors and manager
17 Mitchell.

18 3.22 On November 23, 2022, a Boeing Corporate Investigator, Todd Johnson,
19 contacted the Renton Police Department stating that he was "assigned an investigation into this
20 incident on the Boeing side."

21 3.23 Prior to November 21, 2022, based upon information known to Boeing,
22 including supervisors on text messages and manager Mitchell, Boeing had knowledge of
23

1 O'Connor's unfitness to be an employee, and/or failed to exercise reasonable care to discover
2 his unfitness before continuing to retain O'Connor.

3 **IV. Causes of Action**

4 **(Negligence)**

5 4.1 All paragraphs above are incorporated herein.

6 4.2 Boeing was negligent, including negligent retention, when it failed to take
7 actions that ultimately resulted in Mr. Washington's death. This includes, but is not limited to,
8 retaining O'Connor with the knowledge of his unfitness, and/or failing to use reasonable care
9 to discover it before retaining him.

10 4.3 Plaintiff suffered damages as a proximate cause of Boeing negligence, including
11 death. The true extent and amount of damages will be determined at trial.

12 **(Washington Law Against Discrimination)**

13 4.4 All paragraphs above are incorporated herein.

14 4.5 Boeing, through its managers and supervisors and "leads," discriminated against
15 Mr. Washington because of his race (Black man) and sex. Boeing knowingly permitted a
16 supervisor to continue to have a sexual relationship with Mr. Washington, Pettit's subordinate.

17 4.6 Plaintiff suffered harm as a result of Boeing's conduct. The true extent and
18 amount of damages will be determined at trial.

19 **V. RESERVATION OF RIGHTS**

20 5.1 Plaintiff reserves the right to add additional parties to this lawsuit as well as
21 make further claims and/or amend claims set forth herein as may be warranted by discovery.

VI. DEMAND FOR A JURY TRIAL

6.1 Plaintiffs demand a jury trial of twelve jurors.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

- (a) Judgment against Defendant for general and special damages in an amount to be proven at trial;
- (b) An award of reasonable attorneys' fees and costs as available under law;
- (c) An award of any and all applicable interest on the judgment;
- (d) An award of such other and further relief as the Court deems just and proper under the circumstances of this case.

DATED this 13th day of December 2023.

s/Sumeer Singla
Sumeer Singla, WSBA #32852
Attorney for Plaintiff
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: (206) 628-6600
Fax: (206) 628-6611
ssingla@williamskastner.com
Attorney for Plaintiff

s/Lawand Anderson
Lawand Anderson, WSBA #49012
L.A. LAW & ASSOCIATES, PLLC
22030 7th Avenue South, Suite #103
Des Moines, WA 98198-6219
Telephone: (206) 429-3325
Email: lawand@lalaw.legal
Attorney for Plaintiff